

# **U.S. Department of Housing and Urban Development**

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## **OFFICE OF PUBLIC AFFAIRS**

### **HUD.GOV – Social Media**

Privacy Impact Assessment

**3-30-2011**

## Abstract

<<INSERT ANSWER HERE>>

HUD has written this general privacy impact assessment (PIA) to document these informational and collaboration-based portals in operation at HUD and its components which collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are “members” of the portal or who seek to gain access to the portal “potential members.”

## Overview

The Department’s mission encompasses a wide variety of activities including creating strong, sustainable homeownership, and quality affordable homes for all. HUD is working to strengthen the housing market to bolster the economy and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform for improving quality of life; build inclusive and sustainable communities free from discrimination; and transforming the way HUD does business.

In order to facilitate these activities the Department requires contact with the public as well as partners in other federal, state, local, and governmental organizations (hereinafter known as “partners”). Part of the Department’s interaction with its partners involves the need to establish a means of communication that allows individuals from many different geographic regions to collaborate in a meaningful way. HUD and its components have created varying types of online portals designed to facilitate this collaboration. Most portals consist of the following elements or some combination thereof:

- Web-based interface
- User registration and authentication
- Log-in and verification
- General information area open to all users
- Specific subject matter areas open to select users
- Document libraries and common resources
- Collaboration tools such as a member directory, message boards, and/or shared spaces available for members to post comments, links and documents relevant to the subject of the portal.

HUD and its components’ portals can be organized into two broad categories based on the overall purpose of the portal: 1) informational/collaboration-based, and 2) operations-based.

**Informational/Collaboration-Based** – The primary purpose of this type of portal is to facilitate the dissemination and exchange of relevant information among authorized users. The content of

the information exchanged through the portal does not contain PII except for limited contact information about portal members. Members of the portal may have the ability to post relevant information such as lessons learned and best practices for the benefit of other members of the portal. PII collected from and exchanged among members is limited to contact information such as name, email address, and mailing address, and business or governmental affiliation. HUD also operates portals without collaboration tools that simply provide authorized users with access to information that do not contain PII. Such portals are for informational purposes only and collect PII solely for the purpose of facilitating registration to the portal. **This PIA covers informational/collaboration-based portals<sup>1</sup>.**

**Operations-Based** – The primary purpose of this type of portal is to facilitate an operational function, mission, or process (e.g., law enforcement, human resources, financial management, emergency management, etc). The content and exchange of information through this type of portal may contain PII (including sensitive PII) about individuals who are not members of the portal. For example, a law enforcement operations-based portal may be used to disseminate and exchange sensitive PII such as Social Security number, date of birth and a physical description about an individual who is the subject of an investigation. In this example, the purpose of the portal extends beyond a basic informational/collaborative scope. In addition, the information exchanged may include sensitive PII about a broader category of individuals that are not members of the portal. **This PIA does NOT cover operations-based portals.**

Portal operators seeking to determine whether their portal is informational or operational should answer the following questions:

- Do the portal's functions extend beyond informational and/or collaborative purposes into operational uses of PII?
- Does the portal collect or exchange sensitive PII?<sup>2</sup>
- Does the portal exchange PII about individuals that are not members or potential members of the portal?

Expanding the scope of collection beyond an informational/collaborative purpose, the collection and exchange of sensitive PII, and/or the exchange of PII about a broader category of individuals than members of the portal may create enhanced privacy risks. Accordingly, if a portal operator's answer to any of the above questions is yes, the portal in question is most likely an operations-based portal and will require a separate PIA.

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<sup>1</sup> Similar to the Contact Lists PIA used by HUD, portal operators seeking coverage by this general PIA must submit a specific IPA to the Privacy Office.

<sup>2</sup> The Privacy Office encourages Components to collect non-sensitive PII as an alternative to sensitive PII wherever possible, including for registration purposes. If your Component seeks coverage by this PIA and collects sensitive PII for registration purposes, please consult with the Privacy Office and provide justification for the collection of this information. The Privacy Office will then determine whether the relevant portal may be covered by this PIA.

Should a portal qualify as informational/collaboration-based, the operator may seek coverage by this PIA. In order to be considered as covered by this PIA, program managers and portal operators must submit a IPA to the Chief Privacy Officer, Privacy Office establishing that:

- A mission need for operation of the portal exists and the authority to collect the information lies within each program or project's authorizing legislation, regulation, or order.

- The portal members are verified during the registration process to ensure they are authorized to use the portal.<sup>3</sup>
- The information collected from and exchanged among portal members is limited to non-sensitive PII.
- PII collected, used or exchanged is limited to the purpose(s) of facilitating registration to the portal, providing information to, and collaboration among authorized members.
- PII exchanged on the portal is limited to members' or potential members' contact information.
- Upon registration to the portal, an appropriate Privacy Act notice (5 U.S.C 552a ((e)(3) statement) is given to the potential member outlining the uses of PII. Members are provided notice both at the time of registration and prior to posting any information that the purpose of the portal is for information and collaborative purposes and are instructed not to post operational PII on shared spaces of the portal. Portal administrators frequently review shared spaces to ensure PII is not posted and have the ability to remove inappropriate member postings.
- The portal has been reviewed by the Chief Information Security Officer (or designee) and if applicable, the portal has obtained an Authority to Operate (ATO) from the Chief Information Security Officer (or designee).<sup>4</sup>
- Applicable System of Records Notice(s) (SORNs) have been reviewed to ensure that the information collected and its uses do not exceed the boundaries of the notice (See Section 6).
- Any program manager or portal operator seeking to use this PIA as privacy documentation for its portal must submit a specific IPA detailing how it has met these requirements to the Privacy Office. Please contact the Privacy Office to obtain this IPA at [Donna.Robinson.Staton@HUD.gov](mailto:Donna.Robinson.Staton@HUD.gov) . Once the IPA is approved and a determination is

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<sup>3</sup> HUD operates multiple types of informational/collaboration based portals. Portal operators determine who is eligible to become a member of the portal and the level of verification of these individuals should be commensurate with the risk of the informational/collaboration-based portal.

<sup>4</sup> Portal operators must provide the date of the ATO to the Privacy Office.

made that the portal meets the requirements, the portal's name and component will be added to Appendix A of this document as a qualifying portal.

## **PROGRAM SPONSORS COMPLETING THE PRIVACY IMPACT ASSESSMENT**

Please submit answers to the Chief Privacy Officer in the Office of the Chief Information Officer (OCIO). For all questions that do not apply, state Not Applicable (N/A) for that question, and briefly explain why it is not applicable.

**Program Area:**

**System Owner:**

**Subject Matter Expert in the Program Area:**

**Program Area Manager:**

**IT Project Leader:**

**Program Sponsor:**

**For IT Systems:**

- **Name of System:**
- **PCAS #:**
- **OMB Unique Project Identifier #:**
- **System Code:** P068
- **OMB Control # (if applicable)**
- **Development/Implementation Date:**

## **Section 1.0 Characterization of the Information**

The following questions are intended to define the scope of the information requested and/or collected as well as reasons for its collection as part of the program, system, rule, or technology being developed.

### **1.1 What information is collected, used, disseminated, or maintained in the system?**

When setting up a social media account (Twitter, Facebook, Youtube, Flickr) the information required is first name, last name and an e-mail address. Before setting up a social media account, a program office must submit a proposal for the use of social media to the Office of Public Affairs. Public Affairs will then approve or disapprove the use of social media. If approved, Public Affairs will set up all social media accounts. Then hand over content management of the account to the designated program office personnel.

### **1.2 What are the sources of the information in the system?**

After a Twitter or Facebook account has been established, fans or followers are able to post comments or questions without being moderated. The Office of Public Affairs manages these accounts and reviews them on a daily basis for any PII. If for any reason, a follower/fan posts any personal PII, it is immediately removed.

### **1.3 Why is the information being collected, used, disseminated, or maintained?**

Information that is posted on HUD's social media sites consists of press releases, training information, blog posts, news articles about HUD and its program and program office information. This information is another way for citizens and stakeholders to stay abreast of the latest information from HUD and its program offices.

### **1.4 How is the information collected?**

Information is collected directly from the third party social media sites.

### **1.5 How will the information be checked for accuracy?**

Comments & questions posted on HUD's social media are submitted by the general public voluntarily. Followers/fans are only about to edit/delete their own comments and questions.

### **1.6 What specific legal authorities, arrangements, and/or agreements defined the collection of information?**

Specific legal authorities, arrangements, and/or agreement are outlined in HUD's Social Media policy.

### **1.7 Privacy Impact Analysis: Given the amount and type of data collected, discuss the privacy risks identified and how they were mitigated.**

**There is no way to prevent someone from posting their personal PII on HUD's social media sites. However, the statement below is posted on HUD's Facebook page.**

While HUD will not be collecting or retaining these comments in our records, this is a public forum and any information provided in comments may be publicly available on Facebook and the privacy policies of Facebook apply. As such, please do not include personal details such as: social security number, or any other information you do not want available to the general public. If you choose to post personal information you do so at your own risk. HUD disclaims any liability for any loss or damage resulting from any comments posted on this page. This forum may not be used for the submission of any claim, demand, informal or formal complaint, or any other form of legal and/or administrative notice or process, or for the exhaustion of any legal and/or administrative remedy. If you have specific questions regarding a HUD program that involves details you do not wish to share publicly please contact the program point of contact listed at <http://portal.hud.gov/portal/page/portal/HUD/localoffices>



## **Section 2.0 Uses of the Information**

The following questions are intended to delineate clearly the use of information and the accuracy of the data being used.

### **2.1 Describe all the uses of information.**

The information posted on our social media sites is already available on hud.gov. Also, when answering questions via these sites they are always pointed to the website. For example, if they are looking for information about public housing they are pointed to the list of public housing authorities on our website.

### **2.2 What types of tools are used to analyze data and what type of data may be produced?**

The data produced on our social media sites is the most up to date information regarding HUD's programs as well as any information from the Secretary that is most important.

### **2.3 If the system uses commercial or publicly available data please explain why and how it is used and whether the portal information is available to individuals on a HUD website.**

*Note: If the web portal members routinely post commercial or publicly available data containing PII (e.g. to facilitate an operational function, mission, or process), it cannot be covered under this PIA.*

The questions from followers and information posted on the social media sites are available publicly. Anytime a question is answered they are always pointed in the direction to the website for further information.

### **2.4 Privacy Impact Analysis: Describe any types of controls that may be in place to ensure that information is handled in accordance with the above described uses.**

Questions/comments are monitored on a daily basis by staff in the Office of Public Affairs to ensure no privacy information is placed on the social media sites.

## **Section 3.0 Retention**

The following questions are intended to outline how long information will be retained after the initial collection. Guidance for this section should obtain from HUD retention use and disposal policy. It should also be validated that these procedures are outlined in the contracted service agreement to ensure that the contracted system does not hold onto data after services are no longer provided.

### **3.1 How long is information retained?**

Questions are always answered on the social media sites with a direct link to the HUD website. Since questions are answered with a link to the website, the retention of records falls under the web management records schedule.

### **3.2 Has the retention schedule been approved by the component records officer and the National Archives and Records Administration (NARA)?**

**<<ADD ANSWER HERE>>**

No. We are still currently awaiting approval from NARA for our social media submission.

### **3.4 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.**

**<<ADD ANSWER HERE>>**

The risk for destroying records before or after retention period could create lawsuits to the Department if requests are made through FOIA for records we do not have and should or records that should have been destroyed and have not. The length of time records are retained depends upon the “type” of records they are.

## **Section 4.0 Internal Sharing and Disclosure**

The following questions are intended to define the scope of sharing within the Department.

### **4.1 With which internal organization(s) is the information shared, what information is shared and for what purpose?**

Links to the social media sites are placed on the external website but are not shared on the internal HUD website.

#### **4.2 How is the information transmitted or disclosed?**

**The Department uses its social networking sites such as Facebook and Twitter to transmit vital information to the public and HUD employees.**

**We inform HUD employees about its social networking sites via the weekly “HUD Happenings” newsletter and the monthly newsletter “In-House.”**

#### **4.3 Privacy Impact Analysis: Considering the extent of internal information sharing, discuss the privacy risks associated with the sharing and how they were mitigated.**

**In accordance with our social media policy, the following policies are in place.**

Accounts on Social Media websites may be requested for Office or Functional level activities. No official HUD accounts will be created for individuals except Executive Level Leadership (e.g., Secretary’s Blog, Assistant Secretary’s Twitter feed, etc.)

2. Requests for an account on a Social Media website must contain, at a minimum, a justification based on a mission-related need, identification of the staff member who will be responsible for maintaining the account, and will be submitted to the Office of Public Affairs. Specify who may request an account.

3. All HUD content posted to a non-HUD external website must also exist on HUD’s own website. Social Media sites can be used as another distribution point or act as a marketing tool to point our audience to our content. Always ask, “If this site were to go away, can someone still find this content on HUD’s websites?”

4. Disclaimer – HUD will post a disclaimer to inform users/members of the public that they are leaving the official HUD website for the HUD Facebook page. When a users clicks to go on the HUD Facebook page or twitter feed etc., the screen should read “You are exiting the HUD server. You will now access <http://www.Facebook.HUD>. Statements on the HUD Facebook page/twitter/ are not official HUD policy. For official HUD policy statements, see the official HUD website”

5. All content must follow all laws, regulations, and executive orders, which include but is not limited to, copyright, trademark, and privacy laws.

6. Content posted by HUD on a Social Media site must comply with the requirements of Section 508 of the American Rehabilitation Act of 1973.

7. Guest books, surveys, forms, and any other materials that request information from the public must comply with the intent of the Paperwork Reduction Act (PRA) ).

8. All content, including postings to blogging websites, posted to Social Media websites in an official capacity are immediately in the public domain. No  
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assertion of copyright protection to content posted on a Social Media site can be claimed.

9. Public comments and postings are constitutionally protected free speech and will remain posted pending legal review. Questions regarding public comments and postings should be directed to the Office of General Counsel Administrative Law Division.

10. Whenever possible, accounts on Social Media sites should be identified by using the Department's full name (U.S. Department of Housing and Urban Development), the Department's Official Seal, and where appropriate, a link to <http://www.hud.gov>, and/or <http://espanol.hud.gov>.

11. Behavior and conduct on Social Media sites by offices and staff should comply with the *Standards of Ethical Conduct for Employees of the Executive Branch*. These standards cover prohibited activities such as

- ☐ Engaging in vulgar or abusive language, personal attacks of any kind, or offensive terms targeting individuals or groups.
- ☐ Endorsement of commercial products, services, or entities.
- ☐ Endorsement of political parties, candidates or groups.

12. In addition, the Personnel Law Division has identified potential violations of HUD's Social Media policies and procedures, pursuant to HUD Handbook 0752.02 Rev-03, Table of Offenses and Penalties

- ☐ Offense No. 2, Improper or unauthorized release of Agency information or employee records;
- ☐ Offense No. 4, Making false, malicious or unfounded statements against co-workers, supervisors, subordinates, or Government officials which tend to damage the reputation or undermine the authority of those concerned.
- ☐ Offense No. 5, Use of insulting, abusive or offensive language to or about other employees;
- ☐ Offense No. 6, Threatening behavior;
- ☐ Offense No. 10, Misuse of Government property, records, or information;
- ☐ Offense No. 12, Misuse of official Government credentials;
- ☐ Offense No. 34, Standards of Conduct violations; and
- ☐ Offense No. 42, Criminal, infamous, dishonest, immoral, or notoriously disgraceful conduct or conduct prejudicial to the Federal Government.

13. No personally identifiable information (PII) may be requested or collected from Social Media sites

14. OMB's Official Memorandum on Privacy Guidance for Agency Use of ThirdParty Websites and Applications will be followed. A statement of online privacy should be drafted, posted, and updated periodically to address concerns with cookies, online comments and personal information, children's privacy and the preservation of data by NARA. Please see privacy policies of the White House, <http://www.whitehouse.gov/privacy> and The Recovery Act, <http://www.recovery.gov/Pages/privacypolicy.aspx>.

15.

16. A statement of record retention should be posted. “This is the HUD page on Facebook. Comments posted on and messages received through HUD pages are considered Federal records and shall be archived.” Please see NARA’s General Records Schedules, in particular Section 20 on electronic records. <http://www.archives.gov/records-mgmt/grs/>.

17. All content posted on Social Media sites in an official capacity must be cleared by management level officials of at least the branch chief level in Headquarters and at least the Office Director level in the field. Employees should get prior approval from their supervisors before drafting material to be posted.

18. All content of a political or policy nature must be coordinated through the Office of Public Affairs before it is posted.

Staff may have personal accounts on Social Media sites as long as they do not represent that they speak for the Department. A best practice is to not be identified as a HUD employee. However, there are times when this is not possible or practical. In those cases, extra caution is warranted to ensure your comments are not taken as speaking for the Department.

2. Never use or reference your position with the Department when writing or posting in a personal capacity. If you are easily identified as a HUD employee, you may want to consider a disclaimer on your personal social media sites (blogs, facebook pages, etc) such as:

*The posts on this site, including but not limited to images, links, and comments left by readers, are my own and don’t necessarily represent the Department of Housing and Urban Development.*

3. Be aware that your activities on HUD’s Social Media and other web sites may be restricted by law. For example, activities and comments of a political nature are governed by the Hatch Act, whether you are posting in an official or personal capacity on HUD’s Social Media and other websites. An employee who blogs on his or her personal social media site is not restricted by HUD or the Hatch Act, provided the employee does not identify himself or herself as a HUD employee.

4. Contractors and others who have relationships with HUD need to exercise special caution that their activities on Social Media sites could not be misinterpreted as representing the Department. When signing up for a personal account on one of these sites, Department email addresses should be avoided, and all caution should be taken to ensure that there is no appearance of that their postings, behavior, or actions reflect negatively on the Department or its activities.

## **Section 5.0 External Sharing and Disclosure**

The following questions are intended to define the content, scope, and authority for information sharing external to HUD which includes Federal, state and local government, and the private sector.

### **5.1 With which external organization(s) is the information shared, what information is shared, and for what purpose?**

Links to the social media sites are shared on the external website. This allows anyone who visits the website to be able to follow information posted on these sites. Information posted on the social media sites comes from various program offices throughout HUD. The information shared on these sites allows citizens to stay current on housing information.

**5.2 Is the sharing of personally identifiable information outside the Department compatible with the original collection? If so, is it covered by an appropriate routine use in a SORN? If so, please describe. If not, please describe under what legal mechanism the program or system is allowed to share the personally identifiable information outside of HUD.**

The Office of Public of Affairs does not collect PII internally or externally via its social networking sites.

**5.3 How is the information shared outside the Department and what security measures safeguard its transmission?**

N/A: Information shared on the social media sites is information that is already publicly posted on the HUD website.

**5.4 Privacy Impact Analysis: Given the external sharing, explain the privacy risks identified and describe how they were mitigated.**

Since the information shared on the social media sites is already publicly posted on the HUD website there are no privacy risks. Information posted on the social media sites ranges from press releases to program information already cleared for posting on HUD.gov.

## **Section 6.0 Notice**

The following questions are directed at notice to the individual of the scope of information collected, the right to consent to uses of said information, and the right to decline to provide information.

**6.1 Was notice provided to the individual prior to collection of information?**  
(A notice may include a posted privacy policy, a Privacy Act notice on form(s),

and/or a system of records notice published in the Federal Register.) Please provide a copy of the notice as an appendix.

**Here you must confirm whether a Privacy Act System of Records Notice is required under U.S.C. 552a.**

**With the redesign of HUD.gov we will be implementing intercept pop up notices which will inform users when they are about to leave HUD's official site.**

**The following statement is posted on the HUD Facebook page:**

Welcome to the HUD Facebook page. If you're looking for the official source of information about HUD, please visit [www.hud.gov](http://www.hud.gov).

We are providing the links to HUD's presence on other third party sites for your reference. HUD does not endorse any non-government websites, companies or applications.

While HUD will not be collecting or retaining these comments in our records, this is a public forum and any information provided in comments may be publicly available on Facebook and the privacy policies of FaceBook apply. As such, please do not include personal details such as: social security number, or any other information you do not want available to the general public. If you choose to post personal information you do so at your own risk. HUD disclaims any liability for any loss or damage resulting from any comments posted on this page. This forum may not be used for the submission of any claim, demand, informal or formal complaint, or any other form of legal and/or administrative notice or process, or for the exhaustion of any legal and/or administrative remedy. If you have specific questions regarding a HUD program that involves details you do not wish to share publicly please contact the program point of contact listed at <http://portal.hud.gov/portal/page/portal/HUD/localoffices>

**6.2 Do individuals have the opportunity and/or right to decline to provide information? Are they made aware of the HUD official web site(s) that provide the same information?**

**Yes they do. The following statement has been posted on the HUD Facebook page:**



Welcome to the HUD Facebook page. If you're looking for the official source of information about HUD, please visit [www.hud.gov](http://www.hud.gov).

We are providing the links to HUD's presence on other third party sites for your reference. HUD does not endorse any non-government websites, companies or applications.

While HUD will not be collecting or retaining these comments in our records, this is a public forum and any information provided in comments may be publicly available on Facebook and the privacy policies of FaceBook apply. As such, please do not include personal details such as: social security number, or any other information you do not want available to the general public. If you choose to post personal information you do so at your own risk. HUD disclaims any liability for any loss or damage resulting from any comments posted on this page. This forum may not be used for the submission of any claim, demand, informal or formal complaint, or any other form of legal and/or administrative notice or process, or for the exhaustion of any legal and/or administrative remedy. If you have specific questions regarding a HUD program that involves details you do not wish to share publicly please contact the program point of contact listed at <http://portal.hud.gov/portal/page/portal/HUD/localoffices>

**6.3 Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise the right?**

Individuals that post to the social media sites are able to post comments/questions as they would like. However, if for any reason PII is posted on the page, it is immediately removed.

**6.4 Privacy Impact Analysis: Describe how notice is provided to individuals, and how the risks associated with individuals being unaware of the collection are mitigated.**

A statement has been posted to HUD Facebook page addressing these issues. Please see above.

**Section 7.0 Access, Redress and Correction**

The following questions are directed at an individual's ability to ensure the accuracy of the information collected about them.

**7.1 What are the procedures that allow individuals to gain access to their information?**

If a follower to one of our social media sites posts a question or comment they have the ability to remove or edit their specific question/comment only.

**7.2 What are the procedures for correcting inaccurate or erroneous information?**

If a follower posts information that is incorrect or erroneous, the Office of Public Affairs will follow up immediately with the correct information.

**7.3 How are individuals notified of the procedures for correcting their information? (Provide Supporting documentation)**

Once a comment has been posted to correct the information, social media followers will receive notice via their personal social media site. Individuals will always be directed to the correct information posted on the HUD website.

**7.4 If no formal redress is provided, what alternatives are available to the individual?**

<<ADD ANSWER HERE>>

Individuals are able to delete their respective comments posted on Facebook and Twitter. We also intend to publish an email address on the HUD Facebook page so that followers are able to contact HUD with any questions or concerns about our social media sites.

**7.5 Privacy Impact Analysis: Please discuss the privacy risks associated with the redress available to individuals and how those risks are mitigated.**

We never share or publish individual email address externally of HUD's social networking followers. They are kept in strict confidence within the Department.

**Section 8.0 Technical Access and Security**

The following questions are intended to describe technical safeguards and security measures.

**8.1 What procedures are in place to determine which users may access the system and are they documented?**

Only the Office of Public Affairs has access to the social media sites and are able to post information from HUD. Here you must document the procedures or provide reference to the documentation that support this request

The Office of Public Affairs vets requests in accordance with our social media policy. The Office will refer public comments believed to be illegal or statements it wishes to remove to OGC for legal review.

**8.2 Will Department contractors have access to the system?**

No

**8.3 Describe what privacy training is provided to users either generally or specifically relevant to the program or system?**

<<ADD ANSWER HERE>>

The following is posted on our Facebook page to inform and train users

While HUD will not be collecting or retaining these comments in our records, this is a public forum and any information provided in comments may be publicly available on Facebook and the privacy policies of FaceBook apply. As such, please do not include personal details such as: social security number, or any other information you do not want available to the general public. If you choose to post personal information you do so at your own risk. HUD disclaims any liability for any loss or damage resulting from any comments posted on this page. This forum may not be used for the submission of any claim, demand, informal or formal complaint, or any other form of legal and/or administrative notice or process, or for the exhaustion of any legal and/or administrative remedy. If you have specific questions regarding a HUD program that involves details you do not wish to share publicly please contact the program point of contact listed at <http://portal.hud.gov/portal/page/portal/HUD/localoffices>

**8.4 Has Certification & Accreditation been completed for the system or systems supporting the program?**

No

**8.5 What auditing measures and technical safeguards are in place to prevent misuse of data?**

<<ADD ANSWER HERE>>

The Office of Public Affairs suggests that this question is answered by OCIO and Security because we feel this question falls within the IT realm.

Please refer to you answers to 1.2, 1.5,5.4 and 7.2. All of these actions by your office are considered auditing measures and technical safeguards.

**8.6 Privacy Impact Analysis: Given the nature and scope of the information collected, as well as any information sharing conducted on the system, what privacy risks were identified and how do the security controls mitigate them?**

The answer you provided for 5.4 will satisfy this question as well.

<<ADD ANSWER HERE>>

The Office of Public Affairs establishes a social media account on behalf of the requestor. The Office of Public Affairs recommends that OCIO and Security provide comments to this question as well because this pertains to Security and IT.

**Section 9.0 Technology**

The following questions are directed at critically analyzing the selection process for any technologies utilized by the system, including system hardware, biometrics and other technology.

**9.1 What type of project is the program or system?**

<<ADD ANSWER HERE>>

The Office of Public Affairs works in collaboration with the Office of the Chief Information Officer to identify new technologies that will benefit the Department. The above statement is sufficient.

**9.2 What stage of development is the system in and what project development lifecycle was used?**

<<ADD ANSWER HERE>>

The Office of Public Affairs recommends that OCIO provide comments as this question as this pertains to IT.

This not applicable because technically this is not a system.

**9.3 Does the project employ technology which may raise privacy concerns? If so please discuss their implementation.**

**<<ADD ANSWER HERE>>**

The Office of Public Affairs recommends that OCIO provide comments as this question as this pertains to IT.

The Privacy Office suggest the statement should read as follows:

There are no current privacy concerns at this time, due to the fact all information being shared via social media will be coming from the main HUD.GOV webpage that is already Privacy approved.

### **DOCUMENT ENDORSEMENT**

I have carefully assessed the Privacy Impact Assessment (PIA) for **[Insert Name of IT System and/ or Information Collection Request]**. This document has been completed in accordance with the requirement set forth by the [E-Government Act of 2002](#), [OMB Memorandum 03-22](#), and [M-10-23](#), which requires that "Privacy Impact Assessments" (PIAs) be conducted for all new and/ or significantly altered IT Systems, and Information Collection Requests.

### **ENDORSEMENT SECTION**

Please check the appropriate statement.

  **X**   **The document is accepted.**

       **The document is accepted pending the changes noted.**

       **The document is not accepted.**

Based on our authority and judgment, I contest that the data captured in this document is current and accurate.

/s/ April Brown

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**SYSTEM OWNER**  
**[PROGRAM OFFICE]**

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**Date**

/s/ Jereon Brown

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**PROGRAM AREA MANAGER**  
**[PROGRAM OFFICE]**

**3/30/11**

**Date**

/s/ Donna Robinson-Staton

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**DEPARTMENTAL PRIVACY ACT**  
**OFFICER**

Office of the Chief Information Officer  
U. S. Department of Housing and Urban  
Development

**3/30/11**

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**Date**

## **APPENDIX A**

### **Systems Covered by the PIA:**